

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
SUPERIOR COURT**

Hillsborough Superior Court Northern District
300 Chestnut Street
Manchester NH 03101

Telephone: 1-855-212-1234
TTY/TDD Relay: (800) 735-2964
<http://www.courts.state.nh.us>

SUMMONS IN A CIVIL ACTION



Case Name: **Marci Morales v Walgreen's Boots Alliance, Inc, et al**
Case Number: **216-2021-CV-00630**

Date Complaint Filed: September 29, 2021

A Complaint has been filed against Walgreen's Boots Alliance, Inc; Walgreen's Co. in this Court. A copy of the Complaint is attached.

The Court ORDERS that ON OR BEFORE:

November 14, 2021	Marci Morales shall have this Summons and the attached Complaint served upon Walgreen's Boots Alliance, Inc; Walgreen's Co. by in hand or by leaving a copy at his/her abode, or by such other service as is allowed by law.
December 05, 2021	Marci Morales shall electronically file the return(s) of service with this Court. Failure to do so may result in this action being dismissed without further notice.
30 days after Defendant is served	Walgreen's Boots Alliance, Inc; Walgreen's Co. must electronically file an Appearance and Answer or other responsive pleading form with this Court. A copy of the Appearance and Answer or other responsive pleading must be sent electronically to the party/parties listed below.

Notice to Walgreen's Boots Alliance, Inc; Walgreen's Co.: If you do not comply with these requirements you will be considered in default and the Court may issue orders that affect you without your input.

Send copies to:

Jennifer A. Farrell, ESQ

Law Office of Jennifer A Farrell 369 Mast Rd Manchester NH 03102

Walgreen's Boots Alliance, Inc
Walgreen's Co.

108 Wilmot Road Deerfield IL 60015
108 Wilmot Road Deerfield IL 60015

BY ORDER OF THE COURT

September 30, 2021

W. Michael Scanlon
Clerk of Court

(126564)

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NOTICE TO DEFENDANT

Case Name: **Marci Morales v Walgreen's Boots Alliance, Inc, et al**
Case Number: **216-2021-CV-00630**

You have been served with a Complaint which serves as notice that this legal action has been filed against you in the **Hillsborough Superior Court Northern District**. Review the Complaint to see the basis for the Plaintiff's claim.

Each Defendant is required to electronically file an Appearance and Answer 30 days after service. You may register and respond on any private or public computer. For your convenience, there is also a computer available in the courthouse lobby.

If you are working with an attorney, they will guide you on the next steps. If you are going to represent yourself in this action, go to the court's website: www.courts.state.nh.us, select the Electronic Services icon and then select the option for a self-represented party.

1. Complete the registration/log in process. Click Register and follow the prompts.
2. After you register, click Start Now. Select **Hillsborough Superior Court Northern District** as the location.
3. Select "I am filing into an existing case". Enter **216-2021-CV-00630** and click Next.
4. When you find the case, click on the link and follow the instructions on the screen. On the "What would you like to file?" screen, select "File a Response to Civil Complaint". Follow the instructions to complete your filing.
5. Review your Response before submitting it to the court.

IMPORTANT: After receiving your response and other filings the court will send notifications and court orders electronically to the email address you provide.

A person who is filing or defending against a Civil Complaint will want to be familiar with the Rules of the Superior Court, which are available on the court's website: www.courts.state.nh.us.

Once you have registered and responded to the summons, you can access documents electronically filed by going to <https://odypa.nhecourt.us/portal> and following the instructions in the User Guide. In that process you will register, validate your email, request access and approval to view your case. After your information is validated by the court, you will be able to view case information and documents filed in your case.

If you have questions regarding this process, please contact the court at 1-855-212-1234.

THE STATE OF NEW HAMPSHIRE
HILLSBOROUGH COUNTY

SUPERIOR COURT
Docket#: 216-2021-CV-00630
JURY TRIAL (X)

MARCI MORALES
9047 North 48th Avenue
Glendale, AZ 85302

v.

WALGREEN'S BOOTS
ALLIANCE, INC.
d/b/a Store #3900
108 Wilmot Road
Deerfield, Illinois 60015

WALGREEN'S CO.
d/b/a Store #3900
108 Wilmot Road
Deerfield, Illinois 60015

COMPLAINT

1. The Plaintiff is Marci Morales of 9047 North 48th Street, Glendale, Arizona, 85302, a former resident of Manchester, New Hampshire.
2. The Defendants are Walgreen's Boots Alliance, Inc. and Walgreens Co., both with a principal office and mailing address of 108 Wilmot Road, Deerfield, Illinois, 60015.
3. The Defendants own and operate a Walgreen's convenience store and pharmacy doing business as Store #3900, located at or near 227 South Main Street, Manchester, New Hampshire, 03102.
4. This action involves the joint and several negligence of the Defendants in failing to maintain their store in a reasonably safe condition for their customers which resulted in the foreseeable, serious personal injury to the Plaintiff.

FACTS

5. All other paragraphs herein are hereby incorporated by reference.
6. On or about October 24th, 2018, as the Plaintiff entered the Defendants' store to purchase groceries, she slipped on a liquid sitting on a customer aisle floor near the cashier's station. The Plaintiff's legs flew out from beneath her and she crashed to the floor.

7. As a result, the Plaintiff sustained serious injury and permanent impairment, and caused the Plaintiff to suffer, and continue to suffer, severe pain, substantial expenses for medical care and treatment, lost wages, loss of enjoyment of life, and other damages.

NEGLIGENCE

8. All other paragraphs herein are hereby incorporated by reference.
9. The Defendants owed a duty to their store customers and visitors, including the Plaintiff, to use reasonable care in the management and maintenance of the safety of their store, including but not limited to, that of the customer aisles; to keep the store free of unreasonably dangerous conditions and/or defects, and to take safe and proper action for safeguarding them.
10. The Defendants had a duty to warn its customers, including the Plaintiff, of any dangerous conditions and/or defects on the premises, in accordance with the statutory and common law of the State of New Hampshire.
11. The Defendants breached their legal duty to the Plaintiff by:
 - a. Failing to oversee, manage, and maintain the safety of their store;
 - b. Failing to keep their store free of unreasonably dangerous conditions and/or defects;
 - c. Failing to consider and review the conditions of store aisles in anticipation of dangerous scenarios;
 - d. Failing to take appropriate steps to safeguard customers, including the Plaintiff;
 - e. Failing to keep a proper look out for dangerous conditions, and to exercise their duty to warn store customers, including the Plaintiff, of dangerous conditions.
12. The Defendants' negligence resulted in foreseeable personal injury and other harm and losses to the Plaintiff, including but not limited to medical expenses, pain and suffering to the mind and

body, permanent impairment, loss of enjoyment of life, and lost wages, all to the damage of the Plaintiff within the jurisdictional limits of this Honorable Court, plus interest, costs and reasonable attorney's fees.

Wherefore, the Plaintiff seeks judgment against the Defendants in an amount as justice requires all within the jurisdictional limits of this court for:

- a. Reimbursement of medical bills;
- b. Damages for pain and suffering of the mind and body;
- c. Permanent impairment;
- d. Loss of enjoyment of life;
- e. Lost wages;
- f. Other relief as is just and equitable.

Respectfully Submitted,

Marci Morales
By and through her attorney,

Law Office of Jennifer A. Farrell, PLLC

/s/ *Jennifer A. Farrell*

Dated: September 29, 2021

Jennifer A. Farrell, Esq. #13006
Box 1145
Manchester, NH 03105
(603) 491-8075

Merrimack County Sheriff's Office

DAVID A. CROFT
 333 Daniel Webster Hwy
 Boscawen, NH 03303
 Phone: 603-796-6600

WALGREEN'S CO DBA STORE #3900
 108 WILMOT RD
 DEERFIELD, IL 60015

AFFIDAVIT OF SERVICE

MERRIMACK, SS.

DATE: November 2 2021

I, DEPUTY JENNIFER L BOUCHER, this date at 1221 a.m./p.m., summoned the within named defendant WALGREEN'S CO. DBA STORE #3900 as within commanded by leaving at the office of William M. Gardner, Secretary of State of New Hampshire, its true and lawful Attorney for the service of process under, and by virtue of, Chapter 510:4, New Hampshire Revised Statutes Annotated, as amended, a true and attested copy of this Summons and Complaint, and I paid the Secretary of State ten (\$10.00) dollars as his fee for accepting service.

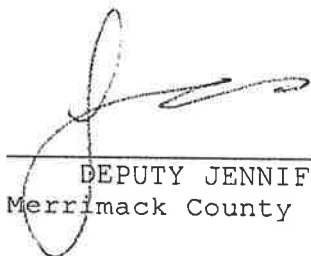
FEES

Service	\$30.00
Postage	1.00
Travel	0.00
PD to SOS	10.00

TOTAL	<u>\$41.00</u>
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A TRUE COPY ATTEST:


DEPUTY BOUCHER
 Merrimack County Sheriff's Office



DEPUTY JENNIFER L BOUCHER
 Merrimack County Sheriff's Office

Merrimack County Sheriff's Office

DAVID A. CROFT
333 Daniel Webster Hwy
Boscawen, NH 03303
Phone: 603-796-6600

WALGREEN'S CO DBA STORE #3900
108 WILMOT RD
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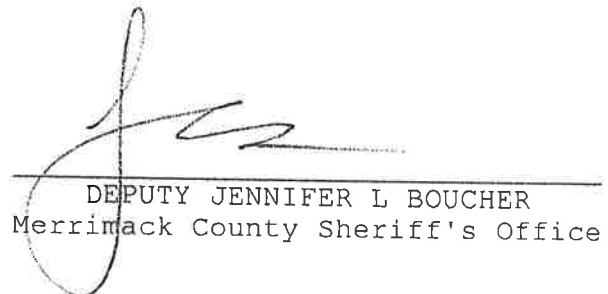
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Postage	1.00
Travel	0.00
PD to SOS	10.00

TOTAL \$41.00

A TRUE COPY ATTEST:



DEPUTY BOUCHER
Merrimack County Sheriff's Office



DEPUTY JENNIFER L BOUCHER
Merrimack County Sheriff's Office

Merrimack County Sheriff's Office

DAVID A. CROFT
 333 Daniel Webster Hwy
 Boscawen, NH 03303
 Phone: 603-796-6600

WALGREEN'S BOOTS ALLIANCE, INC DBA STORE #3900
 108 WILMOT RD
 DEERFIELD, IL 60015

AFFIDAVIT OF SERVICE

MERRIMACK, SS.

DATE: November 2 2021

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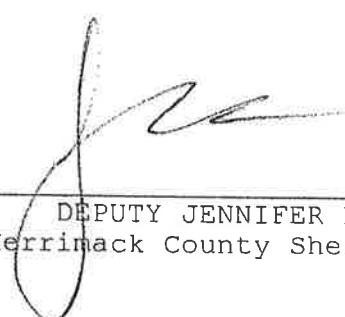
Service	\$30.00
Postage	1.00
Travel	15.00
PD to SOS	10.00

TOTAL	<u>\$56.00</u>
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A TRUE COPY ATTEST:



DEPUTY BOUCHER
 Merrimack County Sheriff's Office



DEPUTY JENNIFER L BOUCHER
 Merrimack County Sheriff's Office